IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CAROL DOUGHERTY,	:	Case No. 1:04CV1682
Plaintiff	:	
	:	Judge Kane
v.	:	
	:	
CIBER, INC.,	:	
Defendant	:	FILED ELECTRONICALLY

DEFENDANT'S PROPOSED SPECIAL VERDICT QUESTIONS

1.   Did Plaintiff Carol Dougherty make a good faith, reasonable complaint to Defendant regarding the Fair Labor Standards Act?

Yes ꓳ   No ꓳ

If your answer to Question #1 is "No" stop. If your answer to Question #1 is "Yes" continue.

2.   Was Plaintiff's comment regarding the Fair Labor Standards Act the cause of Defendant's decision to terminate her employment?

Yes ꓳ   No ꓳ

If your answer to Question #2 is "No" stop. If your answer to Question #2 is "Yes" continue.

EXHIBIT "B"

3.   Is Defendant's proffered reason for terminating Plaintiff's

employment (her performance) a pretext for retaliation?

Yes ꟼ   No ꟼ

If your answer to Question #3 is "No" stop. If your answer to Question

#3 is "Yes" continue.

4.   Should Plaintiff be awarded actual damages?

Yes ꟼ   No ꟼ

If your answer to Question #4 is "No" stop. If your answer to Question

#4 is "Yes" continue.

5.   Actual damages to Plaintiff should equal $_____.